

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Amerock Corporation  
Attn: Rick Mosher  
4000 Auburn Street  
Rockford, Illinois 61101

<u>Application No.:</u> 95120232	<u>I.D. No.:</u> 201030AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 9, 1995
<u>Operation of:</u> Residential Hardware Manufacturing	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> <sup>2</sup> : DATE
<u>Source Location:</u> 4000 Auburn Street, Rockford, Winnebago County	
<u>Responsible Official:</u> Michael Pietrowski, Vice-President of Operations	

This permit is hereby granted to the above-designated Permittee to OPERATE a residential hardware manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:AB:jar

cc: Illinois EPA, FOS, Region 2  
USEPA

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	10
5.0 OVERALL SOURCE CONDITIONS	11
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	16
7.0 UNIT SPECIFIC CONDITIONS	17
7.1 Fuel Combustion Emission Units	
7.2 Coating Lines	
7.3 Paint Burn-Off Oven	
7.4 Paint Stripping/ Acid Line	
7.5 Filtercake Dryer	
8.0 GENERAL PERMIT CONDITIONS	40

8.1	Permit Shield	
8.2	Applicability of Title IV Requirements	
8.3	Emissions Trading Programs	
8.4	Operational Flexibility/Anticipated Operating Scenarios	
8.5	Testing Procedures	
8.6	Reporting Requirements	
8.7	Obligation to Comply with Title I Requirements	
		<u>PAGE</u>
9.0	STANDARD PERMIT CONDITIONS	45
9.1	Effect of Permit	
9.2	General Obligations of Permittee	
9.3	Obligation to Allow Illinois EPA Surveillance	
9.4	Obligation to Comply with Other Requirements	
9.5	Liability	
9.6	Recordkeeping	
9.7	Annual Emissions Report	
9.8	Requirements for Compliance Certification	
9.9	Certification	
9.10	Defense to Enforcement Actions	
9.11	Permanent Shutdown	
9.12	Reopening and Reissuing Permit for Cause	
9.13	Severability Clause	
9.14	Permit Expiration and Renewal	
10.0	ATTACHMENTS	
10.1	Attachment 1 - Allowable Emissions of Particulate Matter	
10.2	Attachment 2 - Example Certification by a Responsible Official	
10.3	Attachment 3 - Guidance on Revising this Permit	
10.4	Attachment 4 - Form 199-CAAPP, Application for Construction Permit (For CAAPP Sources Only)	
10.5	Attachment 5 - Guidance on Renewing this Permit	

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

1.0 SOURCE IDENTIFICATION

1.1 Source

Amerock Corporation  
4000 Auburn Street  
Rockford, Illinois 61101  
815/969-6197

I.D. No.: 201030AAF  
Standard Industrial Classification: 3429, Fabricated Metal  
Products

1.2 Owner/Parent Company

The Newell Company  
29 East Stephenson Street  
Freeport, Illinois 61032

1.3 Operator

Amerock Corporation  
4000 Auburn Street  
Rockford, Illinois 61101

Rick Mosher  
815/969-6197

1.4 General Source Description

Amerock Corporation is located at 4000 Auburn Street in Rockford and involved into the manufacturing of residential hardware.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British Thermal Unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
Cd	Cadmium
CEMS	Continuous Emission Monitoring System
cfm	Cubic Foot per Minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry Standard Cubic Foot
dscm	Dry Standard Cubic Meter
°F	Degrees Fahrenheit
ft	Feet
G	Grams
gal	Gallons
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HMIWI	Hospital/Medical/Infectious Waste Incinerator
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
kW	Kilowatts
l	Liter
LAER	Lowest Achievable Emission Rate
lb	Pound
MACT	Maximum Achievable Control Technology
mg	Milligram
mmBtu	Million British Thermal Units

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

mmscf	Million Standard Cubic Feet
mo	Month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
Pb	Lead
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an Aerodynamic Diameter Less Than or Equal to a Nominal 10 Microns as Measured by Applicable Test or Monitoring Methods
ppm	Parts Per Million
ppmv	Parts Per Million by Volume
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	Standard Cubic Feet
scm	Standard Cubic Meters
SO <sub>2</sub>	Sulfur Dioxide
T	Ton
TEQ	Toxic Equivalency
T1	Title I - Identifies Title I Conditions that have been Carried Over from an Existing Permit
T1N	Title I New - Identifies Title I Conditions that are being Established in this Permit
T1R	Title I Revised - Identifies Title I Conditions that have been Carried Over from an Existing Permit and Subsequently Revised in this Permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt.	Weight
yr	Year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Die Cast Zinc Melting and Holding Furnaces  
Brass Plating and Chemical Coloring  
Bronze Plating  
Brass Plating  
Brushing Machines  
Copper and Nickel Plating  
Zinc Plating

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Oxidize Auto Lines #1 and #2  
Alkaline Washers  
Line Soak Cleaner  
Wastewater Plant

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Furnaces used for melting metals, other than

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

beryllium, with a brim full capacity of less than 450 cubic inches by volume [35 IAC 201.210(a)(6)].

- c. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].
- d. Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].
- e. Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].
- f. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].
- g. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].
- h. Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements



Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	Fuel Combustion Emission Units	1973	None
Unit 2	Coating Lines	1973, 1986	Filters
Unit 3	Paint Burn-Off Oven	1996	Afterburner
Unit 4	Paint Stripping/Acid Line	1973	Scrubber
Unit 5	Filtercake Dryer	1992	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO<sub>x</sub> and HAP emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
  - a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
  - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source, which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 The issuance of this permit does not relieve the Permittee of the responsibility of complying with the provisions of the State of Illinois Rules and Regulations, 35 IAC, Subtitle C, Water Pollution Control, Chapter I. In that the Permittee discharges to Rock River Water Reclamation District, an operating permit must be obtained from the Illinois EPA's Division of Water Pollution Control and remains effective for the duration of facility operations.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

#### 5.5 Source-Wide Emission Limitations

##### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

##### Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	56.93
Sulfur Dioxide (SO <sub>2</sub> )	0.89
Particulate Matter (PM)	79.45
Nitrogen Oxides (NO <sub>x</sub> )	138.64
HAP, not included in VOM or PM	26.28
Total	302.19

##### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

##### 5.5.3 Other Source-Wide Emission Limitations

None

#### 5.6 General Recordkeeping Requirements

##### 5.6.1 Emission Records

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.



- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

### 5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

6.0 NOT APPLICABLE TO THIS SOURCE

## 7.0 UNIT SPECIFIC CONDITIONS

### 7.1 Unit 1: Fuel Combustion Emission Units

#### 7.1.1 Description

Natural gas-fired boilers and heaters used to produce heat and steam at the source.

#### 7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 1	Fuel Combustion Emission Units	<u>Campbell Air Make-Up Air Heaters #1 - #6</u> (Maximum Heat Input - 16.0 mmBtu/Hr Each)	None
		<u>Erie Boilers East and West</u> (Maximum Heat Input - 40.0 mmBtu/Hr Each)	None
		<u>Murray Boiler</u> (Maximum Heat Input - 58.3 mmBtu/Hr)	None

#### 7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions is a natural gas-fired boiler or heater used for processing heat and/or steam for the source needs.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. Each affected fuel combustion emission unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

in Major Metropolitan Areas, because the actual heat input of each fuel combustion emission unit is less than 73.2 MW (250 mmBtu/hr).

- b. Pursuant to 35 IAC 215.303, any fuel combustion emission unit is not subject to 35 IAC 215.301 and 215.302.
- c. All boilers at this location are not subject to the Standards of Performance for Small-Industrial Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc, because these boilers had been constructed prior to June 9, 1989.
- d. This permit is issued based on the affected fuel combustion emission unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel utilized at this source.

7.1.6 Emission Limitations

None

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected fuel combustion emission units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas consumption (mmscf/mo and mmscf/yr)

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

for all affected fuel combustion emission units.

- b. Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.1.12.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 of this permit shall be based on the recordkeeping requirements of Condition 7.1.9 and the emission factors and formulas listed below:

Natural Gas Mode

Pollutant	Emission Factor (Lb/mmscf)
PM	7.6
NO <sub>x</sub>	100.0
SO <sub>2</sub>	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

## 7.2 Unit 2: Coating Lines

### 7.2.1 Description

Residential hardware is processed through different stages of coating operations prior to final plating application.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 2:	466 Unit #1 (1973)	None
	Barrett Air Dry Lacquer Unit #2 (1986)	None
	Two Hand Spray Booths (#461) 1973	None
	One Hand Spray Booth (#465) 1973	None
	Two Mask Spray Booths (#464) 1973	None
	Lacquer Rooms #2 and #4 with Bake Ovens (1973)	Filters
	Ronci Coater (1973)	Filter
	Powder Coating Booths (Booths M, N, P, R, S, 46 Hand/Automatic)	Filters

### 7.2.3 Applicability Provisions and Applicable Regulations

- a. An affected "coating lines" for the purpose of these unit specific conditions is the coating booth or coating station involved into coating application of the residential hardware.
- b. All affected coating lines (except Barrett air dry lacquer Unit #2 and Powder Coating Booths) are subject to the following:
  - i. Owners or operators of coating lines subject to 35 IAC 215.204 may comply with 35 IAC 215.207 rather than with 35 IAC 215.204. The methods or procedures used to determine emissions of volatile organic material under 35 IAC 215.207 shall be approved by the Illinois EPA in accordance with 35 IAC 201. Emissions of volatile organic material from sources subject to 35 IAC 215.204 are allowable, notwithstanding the limitations in 35 IAC 215.204, if the combined actual emissions from selected coating lines at the

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

coating plant, but not including coating lines or other emission sources constructed or modified after July 1, 1979, is less than or equal to the combined allowable emissions as determined by the following equations:

$$E_{ALL} = \sum_{j=1}^m \sum_{i=1}^n (A_i B_i)_j$$

$$E_{ACT} = \sum_{j=1}^m \sum_{i=1}^n (C_i B_i (1 - D_i))_j$$

- ii.  $A_i$  shall be determined by the following formula:

$$A_i = \frac{R_i}{1 - \frac{R_i}{S_i}}$$

- iii. As used in subsection (a) and (b), symbols mean the following:

$E_{ALL}$  = The allowable volatile organic material emissions from the coating plant in kg/day (lb/day).

$A_i$  = The allowable emission limit for a coating pursuant to Section 215.204 expressed in kg/l (lbs/gal) of coating solids.

$B_i$  = The volume of coating solids in l/day (gal/day) in a coating as delivered to the coating line.

$M$  = The number of coating lines included in the combined emission rate.

$N$  = The number of different coatings delivered to a coating line.

$E_{ACT}$  = The actual volatile organic material emissions from the coating plant in kg/day (lbs/day).



FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

$C_i$  = The weight of volatile organic material per volume of solids in kg/l (lb/gal) for a coating.

$D_i$  = The control efficiency by which emissions of volatile organic material from a coating are reduced through the use of control equipment.

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

$R_i$  = The applicable volatile organic material emission limit pursuant to Section 215.204, for a coating in kg/l (lb/gal).

$S_i$  = The density of the volatile organic material in a coating in kg/l (lb/gal).

- iv. This applicability and compliance with 35 IAC 215.207 was approved by the Illinois EPA in the permit #73120019.
- c. The affected Barrett air dry lacquer Unit #2 and Powder Coating Booths are subject to 35 IAC Part 215, Subpart F, Coating Operations: No owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of VOM, delivered to the coating applicator [35 IAC 215.204 (j)(2)]:

	<u>kg/l</u>	<u>lb/gal</u>
Air Dried Miscellaneous Metal Parts and Products Coating	0.42	3.5

- d. Each affected coating line is subject to 35 IAC 212.321(b)(1), which provides that:  
  
No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected Barrett air dry lacquer Unit #2 and Powder Coating Booths are not subject to 35 IAC 215.207 because there were constructed or modified

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

after July 1, 1979.

- b. If the Permittee choose to apply coatings other than established in 35 IAC 215.204 on the affected coating lines, then these lines will not be subject to 35 IAC 215.204 and 215.207 and the Permittee should apply for revision of this permit.
- c. This permit is issued based on the affected coating line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected unit either does not use an add-on control device to achieve compliance with an emission limitation or standard or does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold level.

7.2.5 Operational and Production Limits and Work Practices

The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

7.2.6 Emission Limitations

None

7.2.7 Testing Requirements

Upon request from the Illinois EPA or USEPA the VOM content of each coating applied on the affected coating line shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

7.2.8 Monitoring Requirements

None

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. For coating lines complying with 35 IAC 215.207:
  - i. The volume of coating solids in lb/day in a coating as delivered to the coating line;

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- ii. The weight of volatile organic material per volume of solids in lb/gal for a coating;
  - iii. The density of the volatile organic material in a coating in lb/gal;
  - iv. The allowable volatile organic material emissions from all coating lines in lb/day; and
  - v. The actual volatile organic material emissions from all coating lines in lb/day;
- b. For Barrett air dry lacquer Unit #2:
- i. The name and identification number of each coating and clean-up solvent as applied line;
  - ii. Usage of each coating applied on the affected coating line (gallons/months and gallons/year);
  - iii. VOM content of each such coating applied (lb/gallon, less water);
  - iv. Density of each applied coating (lb/gal); and
  - vi. Total VOM emissions (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.2.12.
- c. For Powder coating booths:
- i. Powder consumption (lb/hr and lb/yr); and
  - ii. Transfer efficiency (%)
- d. For all coating lines:
- i. The usage of clean-up solvent (gal/month and gal/year);
  - ii. Density of each clean-up solvent (lb/gal); and
  - iii. Total VOM emissions (tons/month and tons/year)

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

calculated based on the recordkeeping  
requirements along with compliance procedures  
from Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected coating lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of VOM in excess of the limits specified in Condition 5.5.1 based on the current records and within 30 days of such an occurrence; and
- b. Actual daily emissions of VOM on the coating lines complying with 35 IAC 215.207 in excess of the allowable daily emissions of VOM calculated by using equations from Condition 7.2.3(b) within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Change in the coatings and clean-up solvents used, provided that the affected coating line continue to comply with all emission limitations and standards of this subsection.

7.2.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.321 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected coating lines.
- b. Compliance of the affected Barrett air dry lacquer Unit #2 with VOM emission limitations in Condition 7.2.3(c) shall be based on the recordkeeping

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

requirements in Condition 7.2.9 and by the use of  
either testing or of the formula listed below:



$$\text{VOM Coating Content} = V \times D / [1 - W \times D]$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \Sigma (w_i / d_i)$$

Where:

$w_i$  = Percent exempt compound i in the coating,

$d_i$  = Overall density of exempt compound i, lb/gal

and the summation  $\Sigma$  is applied over water and all exempt compounds i in the coating.

- c. Compliance of all affected coating lines (except Barrett air dry lacquer Unit #2) with VOM emission limitations of 215.207 shall be based on the recordkeeping requirements in Condition 7.2.9 and by the use of equations listed in Condition 7.2.3(b).
- d. Compliance of all affected coating lines with emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the formula listed below:
  - i. Emissions from Coating Operation (EI) =  
[Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %)];
  - ii. Emissions from Cleanup Operation (EII) =  
(Actual Clean-up Solvent Usage (gal/mo) x Average Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %))
  - iii. Total VOM Emissions = EI + EII

7.3 Unit 3: Paint Burn off Oven

7.3.1 Description

The paint burn off oven is used to clean the paint residue of the used paint hooks. The oven is equipped with an afterburner to control VOM emissions.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 3	Pyrolysis Cleaning Furnace #2	Afterburner

7.3.3 Applicability Provisions and Applicable Regulations

- a. An affected "burn off oven" for the purpose of these unit specific conditions is the paint burn off oven with an afterburner which is used to remove paint residue from used paint hooks.

- b. An affected burn off oven is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected burn off oven is not subject to 35 IAC 216.141 and 212.184, because this system is a process emission unit but not a fuel combustion or incineration device.
- b. The affected burn off oven is not subject to any future state or federal regulations which would be based on the 40 CFR 60, Subpart DDDD "Emission

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

Guidelines and Compliance Time for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or before November 30, 1999". This determination is based on the exemption established in 40 CFR 60.2555(k).

- c. This permit is issued based on the affected burn off oven not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected burn off oven does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 7.3.5 Operational and Production Limits and Work Practices

- a. i. The secondary combustion chamber (afterburner) of the affected burn off oven shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F prior to introducing waste into the oven.
- ii. This temperature shall be maintained until burnout of waste in the primary chamber is completed.
- b. The amount of waste input to the oven shall be consistent with the manufacturer's recommended practices for charging of waste.

#### 7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected burn off oven is subject to the following:

E M I S S I O N S			
PM/PM <sub>10</sub>		NO <sub>x</sub>	
(Lb/Hr)(Ton/Yr)		(Lb/Hr)(Ton/Yr)	
3.7	13.3	0.3	1.1

The above limitations were established in Permit 73120019, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

#### 7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

- a. The affected burn off oven shall be equipped with a secondary combustion chamber temperature indicator; and
- b. The condition of affected burn off oven shall be inspected on a periodic basis for the presence of deficiencies.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected burn off oven to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. A secondary combustion chamber temperature during the time of operation;
- b. Amount of waste (paint residue) incinerated (lb/hr and tons/yr);
- c. Hours of operation per year;
- d. Operating logs for oven, which include: the time of starting charging waste; secondary chamber combustion temperature; time burnout of test completed; and
- e. Inspection maintenance log, with dates of inspection, maintenance, repair, or other actions completed.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected burn off oven with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Operation of the secondary combustion chamber (afterburner) with a temperature below than 1400<sup>0</sup> F or

below manufacturer's recommended temperature.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) is assumed to be achieved by the work-practices inherent in operation of the afterburner on affected oven along with the procedures specifying a minimum combustion chamber temperature in Condition 7.3.5, so that no compliance procedures are set in this permit.
- b. To determine compliance with Conditions 5.5.1 and 7.3.6, emissions of PM-10 from the affected burn off paint oven shall be calculated based on the allowable emission rates from Condition 7.3.3(b).

#### 7.4 Unit 4: Paint Stripping/Acid Line

##### 7.4.1 Description

Methylene chloride and hydrochloric acid are used for metal surface cleaning and preparation prior to the further coating application.

##### 7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 4	Methylene Chloride and Hydrochloric Acid Strip/Rinse Tanks	Scrubber

##### 7.4.3 Applicability Provisions and Applicable Regulations

- a. An affected "paint stripping/acid line" for the purpose of these unit specific conditions is designed and used for the metal parts surface preparation prior to the further coating application.
- b. An affected paint stripping/acid line is subject to 35 IAC 212.321(b)(1), which provides that:
 

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].
- c. Batch cold solvent cleaning operations performed on the affected paint stripping/acid line are subject to 40 CFR Part 63, Subpart T "National Emission Standards for Halogenated Solvent Cleaning". These requirements are discussed further in this subsection.

##### 7.4.4 Non-Applicability of Regulations of Concern

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- a. Batch cold solvent cleaning operations performed on the affected paint stripping/acid line are not subject to 35 IAC 215.182, because the methylene chloride used as solvent is not considered VOM.
- b. This permit is issued based on the affected paint stripping/acid line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because of the following:
  - i. The affected paint stripping/acid line is not subject to an emission limitation or standard for HAP (methylene chloride); and
  - ii. The affected paint stripping/acid line does not have potential pre-control device emissions of PM that equals or exceeds major source threshold levels.

7.4.5 Operational and Production Limits and Work Practices

Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the following requirements:

- a. Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater [40 CFR 63.462(a)(2)].
- b. Each owner or operator of a remote-reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts [40 CFR 63.462(b)].
- c. Each owner or operator of a batch cold solvent cleaning machine complying with 40 CFR 63.462(a)(2) or 63.462(b) shall comply with the work and operational practice requirements specified in 40 CFR 63.462(c):
  - i. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container;



FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- ii. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine;
- iii. The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining;
- iv. The owner or operator shall ensure that the solvent level does not exceed the fill line;
- v. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of Condition 7.4.5 (c)(1);
- vi. When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned; and
- vii. The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected paint stripping/acid line is subject to the following:

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected paint stripping/acid line to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Methylene chloride usage (gal/mo and gal/yr or ton/mo and ton/yr);
- b. Hydrochloric acid usage (gal/mo and gal/yr or ton/mo and ton/yr);
- c. Scrubber inspection maintenance log, with dates of inspection, maintenance, repair, or other actions completed.
- d. Total and individual HAP emissions (methylene chloride and hydrogen chloride) in tons/mo and tons/yr.

7.4.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected paint stripping/acid line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Exceedance of the HAP emission limits established in Condition 5.5.1.

- b. Each owner or operator of a batch cold cleaning machine shall submit an initial notification report and a compliance report as described in 40 CFR 63.468(a) and (c):

- i. Initial Notification Report [40 CFR 63.468(a)]

Each owner or operator of an existing solvent

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

cleaning machine subject to provisions of 40 CFR Part 63, Subpart T shall submit an initial notification report to the Illinois EPA no later than August 29, 1995. This report shall include the following information:

- A. The name and address of the owner or operator;
- B. The address (i.e., physical location) of the solvent cleaning machine(s);
- C. A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls;
- D. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993;
- E. The anticipated compliance approach for each solvent cleaning machine; and

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- F. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

ii. Compliance Report [40 CFR 63.468(c)]

Each owner or operator of a batch cold solvent cleaning machine subject to provisions of 40 CFR Part 63, Subpart T shall submit a compliance report to the Illinois EPA. For existing sources, this report shall be submitted to the Illinois EPA no later than 150 days after the compliance date December 2, 1997. This report shall include the following requirements:

- A. The name and address of the owner or operator;
- B. The address (i.e., physical location) of the solvent cleaning machine(s);
- C. A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of subpart T; and
- D. The compliance approach for each solvent cleaning machine.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(b) is assumed to be achieved by the work-practices inherent in operation of the paint stripping/acid line with a fume scrubber, so that no compliance procedures are set in this permit.
- b. To determine compliance with Condition 5.5.1, HAP emissions from the affected paint stripping/acid line

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

shall be calculated based on the following:

i. Methylene Chloride Emissions

Emissions = Methylene Chloride Used (Tons)

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

ii. Hydrogen Chloride Emissions

Emissions = 0.00055 lb HCL/ton of Metal  
Processed

This emission factor is based on the most  
current version of FIRE 6.2 for pickling  
operations (SCC 30300910).

7.5 Unit 5: Filtercake Dryer

7.5.1 Description

The filtercake dryer is used for drying and reduction of the moisture content of sludge generated by wastewater treatment facility.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 5	Filtercake Dryer	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An affected "filtercake dryer" for the purpose of these unit specific conditions is an emission unit used for drying and reduction of the moisture content of the sludge generated by wastewater treatment facility.

- b. An affected filtercake dryer is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.5.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected filtercake dryer not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected filtercake dryer does not use an add-on control device to achieve compliance with an emission limitation or standard.

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

7.5.5 Operational and Production Limits and Work Practices

None



7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected filtercake dryer is subject to the following:

Particulate Matter Emissions	
<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
1.0	2.7

The above limitations were established in Permit 73120019, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected filtercake dryer to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Sludge (filtercake) processed, tons/mo and tons/yr.
- b. Hours of operation, hr/yr.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected paint stripping/acid line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act.

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Exceedance of the PM emission limits established in Condition 7.5.6.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with Condition 7.5.3(b) and 7.5.6 is assumed to be achieved by the work-practices inherent in operation of the affected filtercake, so that no compliance procedures are set in this permit.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_{insert public notice start date} (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an

amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing,

with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions.

Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or



denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to

the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

#### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is

removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

## 9.12 Reopening and Reissuing Permit for Cause

### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.



#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

## 10.0 ATTACHMENTS

### 10.1 Attachment 1 - Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification  
 Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

Where:

P = Process weight rate;  
 E = Allowable emission rate; and,

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

Limits for Process Emission Units for which  
Construction or Modification Commenced On or After  
April 14, 1972 [35 IAC 212.321(c)]:

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

<u>Metric</u>		<u>English</u>	
<u>P</u>	<u>E</u>	<u>P</u>	<u>E</u>
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
  - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application

of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.



3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may

FINAL DRAFT/PROPOSED CAAPP PERMIT

Amerock Corporation

I.D. No.: 201030AAF

Application No.: 95120232

November 15, 2001

require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	I.D. Number:
	Permit Number:
	Date Received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information			
1. Source Name:			
2. Source Street Address:			
3. City:		4. Zip Code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No			
6. Township Name:		7. County:	
		8. I.D. Number:	

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip Code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip Code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
<input type="checkbox"/> Yes <input type="checkbox"/> No	
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application	

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
  - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
  - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Amerock Corporation  
I.D. No.: 201030AAF  
Application No.: 95120232  
November 15, 2001

necessary.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506